

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	No. 19 CR 567
Plaintiff,)	
)	Judge Martha M. Pacold
v.)	
)	
ROBERT SYLVESTER KELLY,)	
)	
Defendant.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

ASHLEY B. COHEN, one of the attorneys of record for Defendant, **ROBERT SYLVESTER KELLY**, respectfully moves this Court for leave to withdraw as counsel for Defendant pursuant to Local Rule 83.17.

1. On May 19, 2022, Ms. Cohen filed her appearance as attorney of record for Mr. Kelly. Dkt. 198.
2. Ms. Cohen is currently the managing partner at Bonjean Law Group, PLLC.
3. Bonjean Law Group's founding partner, Jennifer A. Bonjean, is currently one of the lead counsel for Mr. Kelly.
4. Ms. Cohen represented Mr. Kelly as attorney of record for has represented Mr. Kelly as lead counsel for the duration of his jury trial before the Honorable Judge Harry D. Leinenweber, through sentencing and Mr. Kelly's direct appeal before the Seventh Circuit, and until the disposition of the United States Supreme Court, denying his petition for writ of certiorari to the United States Court of Appeals for the Second Circuit. *See Kelly v. United States*, No. 24-1172, 2025 U.S. LEXIS 2397 (June 23, 2025).
5. Ms. Bonjean represented Mr. Kelly as lead counsel during the same proceedings.

6. Mr. Kelly has retained new counsel, Beau B. Brindly, from the Law Offices of Beau B. Brindley.

7. On May 29, 2024, Beau B. Brindley filed his appearance as lead counsel for Mr. Kelly. Dkt. 462.

8. Mr. Kelly will continue to be represented by the remaining lead attorney of record, Beau B. Brindley, from the Law Offices of Beau B. Brindley.

9. Concurrent with the instant motion, Ms. Bonjean filed her motion to withdraw as counsel for Mr. Kelly.

10. As an employee of Bonjean Law Group, Ms. Cohen, through this motion, seeks to withdraw her appearance as one of the counsel of record for Mr. Kelly.

11. Accordingly, Ms. Cohen respectfully seeks leave of Court to withdraw from the representation of Mr. Kelly.

12. No party will be prejudiced if Ms. Cohen is permitted to withdraw her appearance.

WHEREFORE, counsel respectfully asks the Court to grant this Motion to Withdraw.

Respectfully submitted,

/s/ Ashley B. Cohen

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One of the Attorneys for Defendant Robert Kelly

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on all counsel of record via the Court's Case Management/Electronic Case Filing and/or electronic mail on June 26, 2025.

Respectfully submitted,

/s/ Ashley B. Cohen_____

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*One of the Attorneys for Defendant Robert
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